

**INTEGRATIVE THERAPEUTICS INC.\***NF Formulas PhytoPharmica  
Tyler Encapsulations Vitaline Formulas

9755 SW Commerce Circle, Suite B2

Wilsonville, OR 97070

P: 503.582.8386

F: 503.582.0467

**ENZYMATIC THERAPY\*****&  
PHYTOPHARMICA\***

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313 F: 888.570.6460 (Enzymatic)

P: 920.469.9099 F: 920.469.4418 (Phyto)

**ENZYMATIC THERAPY***What **Better** feels like™*

2778 5 JUL 25 P2:20

July 5, 2005

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

JUL 11 2005

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Complete Liver Cleanse is a special cleansing formula with fiber that goes to work quickly so your liver is thoroughly detoxified!*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterol, Glucomanan, Viscofiber epta glucan (barley)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: \_\_\_\_\_

7/5/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux  
Chief Financial Officer

975 0162

LET 16475



## ENZYMATIC THERAPY

*What **Better** feels like.™*

July 5, 2005

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	The Complete Liver Cleanse has been scientifically designed to use the right formulation of ingredients to help your body do a better job of supporting liver health.*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterol, Glucomanan, Viscofiber ebta glucan (barley)

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Once toxins are on the move, you don't want them reabsorbed.*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterol, Glucomanan, Viscofiber ebta glucan (barley)

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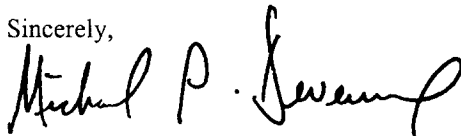
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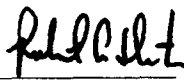
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	For safe and effective cleansing, get the whole family of cleansing products from Enzymatic Therapy.*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterolin, Glucomanan, Viscofiber ebta glucan (barley)

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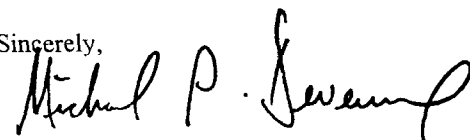
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	When bile is moving, Calcium D-glucarate inhibits the detoxified compounds from reverting back to their original toxic state.*	Calcium D-glucarate

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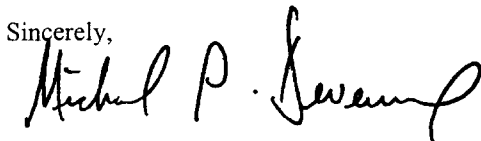
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Complete Liver Cleanse has a specially designed fiber that binds to the toxins so they leave the body!*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterol, Glucomanan, Viscofiber epta glucan (barley)

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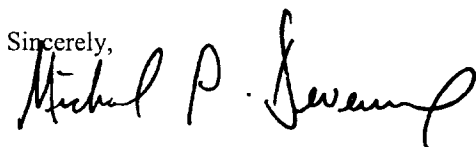
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/6/05

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Michael P. Devereux  
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Complete Liver Cleanse has a specially designed fiber that binds to the toxins and removes them from your body.*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterol, Glucomanan, Viscofiber epta glucan (barley)

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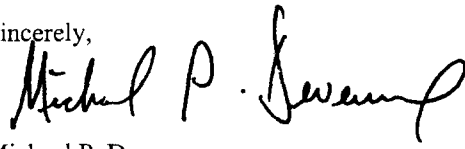
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Toxin absorption with fiber*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterol, Glucomanan, Viscofiber ebta glucan (barley)

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## ENZYMATIC THERAPY

CORPORATION

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Rejuvenate your liver*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterol, Glucomanan, Viscofiber beta glucan (barley)

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NUTRITIONAL PRODUCTS

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Complete Liver Cleanse*	Remove toxins and rejuvenate your liver*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Choelstatin, Glucomanan, Viscofiber ehta glucan (barley)

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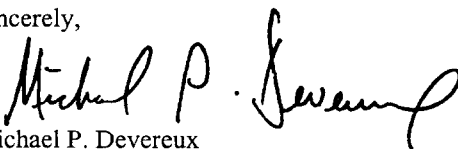
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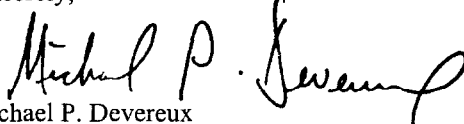
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RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Beta 1, 3-Glucan, and Konjac flour are fibers that bind with the toxic excretions to prevent reabsorption back into the body. These fibers move the toxins out so they are eliminated.*	Silymarin Phytosome, Dandelion Root Extract, Burdock Root Extract, Boldo (peumus boldo) Leaf Extract, Artichoke Leaf, Turmeric Root DC, Calcium D-glucarate, Cholesterol, Glucomanan, Viscofiber beta glucan (barley)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: \_\_\_\_\_

7/6/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux  
Chief Financial Officer

### INTEGRATIVE THERAPEUTICS INC.™

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&  
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